

### REMARKS

The Office Action of October 11, 2006 has been reviewed and the Examiner's comments carefully considered. Independent claim 7 has been modified by the foregoing Amendment, and no new matter has been added. Support for this amendment can be found, for example, on page 7, line 36 through page 8, line 1, page 8, lines 13-19, and in Figs. 1-8 of the originally filed specification. Claims 7-12 are pending in this application, with claim 7 being in independent form.

Claims 7 and 9-12 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,109,691 to Gray et al. (hereinafter "the Gray patent"). Claims 7-8 and 10-12 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,642,916 to Dybro et al. (hereinafter "the Dybro patent"). In view of the following remarks, Applicant respectfully requests reconsideration of these rejections.

As amended, independent claim 7 of the present application recites, *inter alia*, that the link means comprises:

a first member connected to the support member and a second member connected to the seat back, the first and second members hinged together and being arranged to prevent motion of the seat back beyond a predetermined position corresponding to the extension of the first member and the second member.

#### The Gray Patent

The Examiner has submitted that the Gray patent discloses a vehicle seat arrangement having:

link means (30, 46, 72, 76, 77 and 90) connected between the support member and the seat back, and being arranged to prevent motion of the seat back beyond a predetermined position. The link means includes a recliner mechanism (28, 30) and is positioned remote from a pivot connection between the seat back and seat base.

The Gray patent discloses that an upper seat suspension part 46 can be connected to the seat base, that a tether or strap 90 can be secured from the seat base to the floor to limit the amount that the seat is permitted to float in the fore and aft directions, that a length of seat belt webbing 76 and 77 can be secured to a seat belt retractor 82, and that a release latch 30 may be included in the seat base to allow the seat back to articulate relative to the seat base.

The Gray patent does not, however, disclose, teach or suggest that the link means includes a first member connected to the support member and a second member connected to the seat back, the first and second members hinged together and being arranged to prevent motion of the seat back beyond a predetermined position corresponding to the extension of the first member and the second member (emphasis added) as recited by amended claim 7. As acknowledged by the Examiner, the link means of the Gray patent is positioned remote from a pivot connected between the seat back and seat base. Accordingly, the Gray patent does not disclose that the link means is connected to the seat back and that the limit of movement of the seat corresponds to the extension of the first and second members.

Dependent claims 9-12 depend directly from independent claim 7 and are believed patentable for the reasons stated herein. Accordingly, Applicant earnestly requests reconsideration and withdrawal of the rejection of claims 9-12.

#### The Dybro Patent

The Examiner has submitted that the Dybro patent discloses a vehicle seat arrangement having:

link means (20, 50, 54, 62) connected between the support member and the seat back, and being arranged to prevent motion of the seat back beyond a predetermined position. The link means is a mechanical scissor link (20). The link means is positioned remote from a pivot connection between the seat back and seat base.

The Dybro patent discloses a seat assembly including a support structure 20 having crossbars 22 connected to a lower frame 24 of a seat base 12. As acknowledged by the Examiner, the link means of Dybro is “positioned remote from a pivot connection between the seat back and seat base.” Accordingly, Applicant submits that the link means of the Dybro patent does not disclose, teach or suggest “a first member connected to the support member and a second member connected to the seat back, the first and second members hinged together” (emphasis added) as recited by amended claim 7. Furthermore, a tensioning device 50, a means for clamping 54 and a seat belt 62 of the Dybro patent, submitted by the Examiner as comprising the link means, do not disclose first and second members hinged together as recited by amended claim 7.

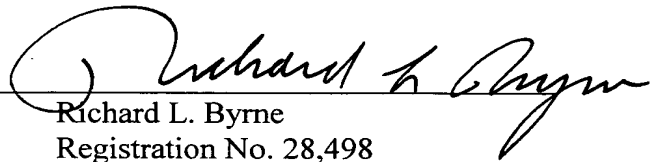
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Dependent claims 8 and 10-12 depend directly from independent claim 7 and are believed patentable for the reasons stated herein. Accordingly, Applicant earnestly requests reconsideration and withdrawal of the rejection of claims 7-8 and 10-12.

Reconsideration of the rejections and allowance of claims 7-12 are requested.

Respectfully submitted,

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